

# Corporate Governance Policy Statement

Reviewed: December 2023



## **CORPORATE GOVERNANCE POLICY STATEMENT**

### **Aim**

This Policy Statement sets out our approach to corporate governance and compliance with legislation in the conduct of our business. This Policy Statement sets out the broad principles by which we operate and should be read along with the related guidelines, procedures and protocols referred to below.

### **Scope**

This Policy Statement applies to all staff, students and members of Court.

### **Principles**

The University is fully committed to ensuring that our corporate governance arrangements:

- are efficient and effective;
- are open, inclusive and transparent;
- meet all relevant legal requirements and obligations;
- provide for proper accountability; and
- promote integrity and impartiality in the conduct of our business.

As part of our commitment, we:-

- take a zero tolerance approach towards bribery and are committed to adopting a risk based approach to manage and mitigate bribery risks through consideration of the six principles set out in Bribery Act 2010 for preventing bribery. This includes giving clear guidance to our staff about what gifts and hospitality they should and should not accept and what process they should follow if they do accept a gift.
- will ensure the proper use of our funds and will put in place adequate procedures to prevent and investigate fraud.
- are committed to acting in line with our responsibilities and the principles set out in the UK General Data Protection Regulation and the Data Protection Act 2018 and to protecting the rights and freedoms of individuals (including staff, students and graduates) when we process their personal data.
- will ensure we have robust processes in place when accepting donations.
- will ensure that our academic awards, resources and reputation are protected by carrying out a comprehensive due diligence exercise for any activity that involves a partner or collaborating body or that puts the University into either an academic agreement or contractual relationship with any organisation or individual for the delivery of academic provision.
- are committed to conducting business in an open environment, leading to transparency and good governance in the spirit of the Freedom of Information (Scotland) Act 2002.
- will ensure we have an effective framework in place for managing our response to major incidents and disruptions to service.

- are committed to ensuring that all members of the University (members of Court, staff and students) feel confident about raising concerns about possible malpractice or wrong-doing within the University and that we have a fair and transparent process in place for reviewing any concerns that are raised
- are committed to managing our records effectively to support our core functions, to comply with our legal and regulatory obligations and to contribute to the effective management of the University.
- will make sure we have effective arrangements in place to manage risk.
- will make sure we have appropriate processes in place to address the health, safety, risk and insurance implications of all business travel.
- will make sure we have processes in place to identify and deal with any conflicts of interest that arise for staff and make sure these any conflicts are appropriately resolved.
- will make sure we have clear processes in place for events and external speakers so that we meet our responsibilities under the Counter Terrorism and Security Act 2015.
- are committed to safeguarding the welfare of our community by making sure we have written procedures explaining the duties of our staff who come into contact with children or vulnerable adults so those individuals are protected from harm.

### **Responsibilities**

The endorsement and upholding of the principles of this Policy Statement are the responsibility of the Court. The Vice Principal (Governance) and University Secretary is responsible for leading the activities within the University which fall under this Policy Statement.

### **Approval**

This Policy Statement was approved by the University Policy and Resources Committee on 23<sup>rd</sup> January 2018.

### **Monitoring and Review**

This Policy Statement will be reviewed as needed due to changes in legislation, standards or sector good practice or where a reorganisation changes ownership, responsibility or accountability. All related Guidelines, Procedures and Protocols will be reviewed annually in line with the University's Annual Compliance Monitoring Statement.

### **Equality Impact Assessment**

A full Equality Impact Assessment was carried out on 22<sup>nd</sup> February 2023.

**Related Codes of Practice, Guidelines, Procedures and Protocols**

Anti-bribery Protocol  
Business Travel Risk Management Procedure  
Conflict of Interest Procedure  
Data Protection Code of Practice  
Donations Procedure  
Due Diligence Procedure  
Fraud Prevention Procedure  
Freedom of Information Procedure  
Gifts and Hospitality Protocol  
Major Incident and Continuity Planning Procedure  
Prevent Duty Events and External Speakers Protocol  
Procedure for the Annual Statement of Assurance  
Public Interest Disclosure (Whistleblowing) Procedure  
Records Management Protocol  
Risk Management Procedure  
Safeguarding of Children and Vulnerable Adults Procedure